**L. Barbee Ponder IV**
General Counsel & Vice President Regulatory Affairs

March 18, 2015

*Via Electronic Filing*

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Ex Parte* Notice: *Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks* – IB Docket No. 13-213

Dear Ms. Dortch:

On March 17, 2015, Jean Philippe Poirier, Solenne Regourd, and Raj Daryanani of BNP Paribas, along with Jay Monroe, Chairman of the Board of Directors and Chief Executive Officer of Globalstar, Inc. ("Globalstar"); Rebecca Clary, Chief Financial Officer for Globalstar; Timothy Taylor, Vice President, Finance, Business Operations and Strategy, for Globalstar; and the undersigned, met with Mindel De La Torre, Troy Tanner, Jose Albuquerque, Karl Kensinger, and Lynne Montgomery of the International Bureau to discuss the above referenced proceeding.

At this meeting, the representatives of BNP Paribas expressed support for the rules the Commission proposed in November 2013 to allow Globalstar to provide low-power terrestrial mobile broadband service (Terrestrial Low Power Service or "TLPS") in its own licensed spectrum at 2483.5-2495 MHz and adjacent, unlicensed spectrum at 2473-2483.5 MHz.[1] They urged the Commission to adopt its proposed rules expeditiously.

Globalstar representatives also discussed the recently completed TLPS demonstration held at the Commission's Technology Experience Center ("TEC"), including Globalstar's results previously filed into the record of this proceeding.[2] We

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[1] *Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks; Amendments to Rules for the Ancillary Terrestrial Component of Mobile Satellite Service Systems*, Notice of Proposed Rulemaking, 28 FCC Rcd 15351 (2013).

[2] *See* Letter from Regina M. Keeney, Counsel to Globalstar, to Marlene H. Dortch, Secretary, FCC, IB Docket No. 13-213 (Mar. 10, 2015).

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explained that Globalstar had demonstrated that TLPS is compatible with existing Bluetooth and Wi-Fi operations in the 2.4 GHz band.

As to the TLPS/Bluetooth capability demonstrations, we explained that Globalstar and the Bluetooth Special Interest Group ("Bluetooth SIG") representatives mutually agreed on the operational parameters for the Bluetooth demonstrations, including the number of devices, power levels, and streaming speeds. As we described in the meeting, Globalstar's demonstration showed that Bluetooth-enabled devices, including a heart rate monitor, wireless speaker, and various computer mouses, worked without any service impact in the presence of TLPS. We indicated that Globalstar had posted video of a TLPS-Bluetooth demonstration on its corporate website (this recording is available at http://www.globalstar.com/en/index.php?cid=6202&from=sidenav).

We also explained that, even though the Bluetooth SIG's representatives brought numerous devices, including wireless speakers and 3D glasses, and spent almost two days at the TEC experimenting with them, they chose to demonstrate only two devices – a hearing aid and prototypes of a meshed automated lighting network. Contrary to the recent *ex parte* letter filed by the Bluetooth SIG, Globalstar categorically disputes the claim that "significant audio disruption" was shown to occur during the demonstration.[3] Indeed, the Bluetooth SIG representative performing the hearing aid demonstration indicated his agreement with those in the room that there was no perceptible degradation in audio quality when TLPS on Channel 14 was activated simultaneously with the three public Wi-Fi channels. Globalstar has requested that the Bluetooth SIG provide the data from its demonstrations, including the audio files generated in the hearing aid demonstration, but such information has not yet been made available.

Regarding the TLPS/Wi-Fi compatibility demonstration, we explained that TLPS was shown to have no negative impact on existing Wi-Fi operations in other channels. Globalstar's data was immediately presented for all observers at the demonstration. These findings demonstrated not only a lack of impact on the adjacent Wi-Fi channels, but also a material increase in the aggregate data throughput across the 2.4 GHz 802.11-capable spectrum.

We pointed out that CableLabs' TLPS/Wi-Fi demonstration set-up was in no sense representative of a real-world deployment, and that any results provided by CableLabs in this proceeding should be entirely discounted. CableLabs requested that Globalstar take down its network of access points in the TEC in order to "sandwich" an inexpensive Belkin access point operating on Channel 11 between multiple Channel 6 access points and multiple TLPS-enabled access points, all within a few feet of one

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[3] *See Ex Parte* Notice for TLPS & Bluetooth Demonstrations, Bluetooth SIG, IB Docket No 13-213, at 1 (Mar. 12, 2015).

another. The Commission should disregard this contrived attempt to force a negative impact on Wi-Fi Channel 11.

Pursuant to section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this *ex parte* notification is being filed electronically for inclusion in the public record of the above-referenced proceeding.

Respectfully submitted,

L. Barbee Ponder IV, General Counsel
and Vice President Regulatory Affairs

cc: Mindel De La Torre
Troy Tanner
Jose Albuquerque
Karl Kensinger
Lynne Montgomery
Mark Settle